

**Before the
Federal Communications Commission
Washington, DC**

In the Matter of)	
)	
Request for Review of the Decision of)	
the Universal Service Administrator)	
or Waiver by)	
)	
Lafayette Parish School System)	File Nos. SLD-1041461,
Lafayette, LA)	1047681, 91900
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	

REQUEST FOR REVIEW OR WAIVER

Lafayette Parish School System (“LPSS”), by its representative, hereby requests that the Commission review and reverse the Decision of the Administrator (“USAC”) in the above-captioned matter.¹ Alternatively, LPSS requests that the Commission reach the same result by waiving its rules.

LPSS provides educational services to students being held at the Lafayette Parish Juvenile Detention Center (“JDC”). When LPSS discovered during the course of a USAC/PIA post-funding commitment review that it had left the JDC off of two FY 2015 E-Rate applications by mistake, it asked USAC to add the site’s entity number to both of them. USAC refused. This is what USAC decided and why:

Upon thorough review of the appeal letter and the relevant documentation, USAC has determined that on January 4, 2016 the appeals team contacted and requested appellant to provide the missing documentation/information and reminded them on February 12, 2016. In addition, on February 16, 2016 another incomplete response was sent emphasizing that the entity number was invalid and to provide the 2015 entity number. Your response on February 17, 2016 included the same entity name and number as in the original request, therefore your request to update the Entity Lafayette Juvenile Detention (BEN 17001409) was denied since the entity number is not valid for FY2015.

¹ Exhibit 1, *Administrator’s Decision on FCC Form 471 Block 4 Update Request*, dated March 7, 2016.

With all due respect, we cannot make heads or tails out of what USAC is trying to say in its decision, which makes appealing it difficult at best. USAC states that it cannot add the JDC's entity number to LPSS's applications because the number is not a "valid" FY 2015 entity number. That explanation is unclear, as there is no such thing as an entity number that is "not valid for FY 2015" or, for that matter, an entity number that is not valid for any specific funding year.

Entity numbers are not validated for, or in any other way attached to, a specific funding year. The entity number that USAC assigns to an entity is the number that USAC requires the applicant to use for that entity, uniformly and without any further validation, regardless of the funding year or years in which the applicant decides to use it. So when USAC says that it has decided to reject LPSS's appeal because the JDC's billed entity number, BEN 17001409, "is not valid for FY 2015," we disagree.

USAC is using the absence of the JDC entity number on its E-Rate applications as reason not to pay LPSS's service provider for Category One ("C1") services delivered to the JDC. In denying payment for services delivered to the JDC, USAC is improperly exercising its authority by denying the addition of the JDC entity number to the FY2015 Form 471 applications. The reason why the JDC's entity number did not appear on the two Form 471 applications was because of a reasonable mistake that LPSS staff made while preparing the Block 4 site lists for those forms. USAC has never disputed this.

Additionally, as a result of this review, LPSS staff has become aware that the JDC entity number was not listed on the LPSS FY2014 Form 471 application number 971900. Accordingly, LPSS requests that the FCC direct USAC to add the site to the FY2014 Block 4 site list as well.

Please note that including the JDC entity number on the three applications would not alter any of LPSS's discount rates. Nor would it require any additional funding. Furthermore, it is not entirely clear that an entity number for the JDC was even necessary in the years in question.

BACKGROUND

As soon as LPSS discovered that it had left the JDC facility off of its FY2015 applications by mistake, it took immediate steps to remedy the oversight. LPSS requested and received an entity number for the site. LPSS then made their first attempt to correct the mistake by asking the PIA reviewer to add it to both of its forms. The reviewer stated that she could not add the number, because she did not have the authority to do so. LPSS's only remedy, she explained, was to appeal. We do not understand why the reviewer could not add the site, since adding and removing sites on E-Rate applications is something that USAC does routinely.

LPSS then prepared and sent a Letter of Appeal to USAC requesting the site be added to both applications for 2015. LPSS received a follow up request for information from USAC. Please note that in the request received from the appeal reviewer, USAC itself provided instructions for obtaining an entity number if one was needed. This seems to also contradict the appeal denial response. If an entity is year specific, then why did USAC provide instructions for obtaining a BEN not once but twice in follow-up. In this case, LPSS had obtained the BEN from the CSB and provided the response to the appeal reviewer. A second follow up request was received. The question was basically the same as the first. LPSS could tell more information was needed, but there was no indication in the 2nd request to indicate what information previously provided was not sufficient, or what further information was needed. LPSS again responded and provided invoice information to validate that services were being provided to the JDC. Copies of the appeal as filed as well as LPSS's response to the review questions are provided.²

During the course of the appeal and the resulting correspondence with the USAC appeal reviewer, LPSS provided documentation for all of the following facts:

FACTS

- (1) The JDC is located across a narrow street from LPSS's central administration building.

² Exhibit 2, Letter of Appeal – Request to Add Eligible Site to Block 4 of Forms 471; E-Rate Appeal Information Request Responses dated February 5, 2016 and February 17, 2016.

- (2) The JDC facility and the students who attend school there are “eligible.”³
- (3) JDC students were included in LPSS’s district-wide discount rate calculation. Students temporarily housed at the JDC are included in the student counts for their respective “home” schools – i.e., the schools to which the student would have been enrolled, had they not been incarcerated.
- (4) LPSS never asked USAC, and USAC never asked LPSS, to reduce the total student count used to calculate the district-wide rate by the number of incarcerated students at the JDC.
- (5) LPSS staff left the JDC off of its Form 471 applications by mistake. The mistake was a clerical and ministerial error.
- (6) Adding JDC as an entity to Block 4 on the two applications now would not affect any of the discount rates on either one.
- (7) LPSS did not ask USAC to increase the size of its funding commitment when it discovered the mistake. That is because the applicable funding requests included the estimated cost of providing C1 service to the JDC.

LPSS’s Mistake. We are calling the omission that led to this appeal a mistake, because it is still not entirely clear that program rules required LPSS to include the JDC’s entity number on its FY 2015 E-Rate applications. USAC’s instructions with respect to entities – what “kind” they are and when to include them in Block 4, etc. – are confusing and constantly changing. While LPSS staff was in the process of preparing its FY2014 and FY 2015 E-Rate applications, it was neither obvious nor intuitive that USAC wanted applicants to include facilities like the JDC in Block 4 of their E-Rate applications for that year. This lack of clarity contributed in large measure to the problem facing LPSS here today.

In addition, because LPSS did not serve meals at the JDC, the facility did not appear on any of the school district’s NSLP/enrollment reports. This, combined with USAC’s ambiguous instructions with respect to entities, made the JDC an especially easy

³ See USAC’s Eligibility Table for Non-Traditional Education (Louisiana-Juvenile Justice) <http://usac.org/sl/applicants/beforeyoubegin/non-traditional/eligibility-table.aspx>

site to overlook while transferring site and enrollment data to Block 4 of LPSS's E-Rate applications. LPSS did not make a conscious decision to leave the JDC off of the form. It was an honest mistake and, all things considered, entirely reasonable and probably not that unusual.

DISCUSSION

It is well established that USAC has the authority to add sites to E-Rate applications when applicants have left them off by mistake and adding them will not require any additional funding. That is the case here.

LPSS left the JDC site off of its applications by mistake. The site, a juvenile detention center, was difficult to categorize for E-Rate purposes, and it was not even entirely clear that it had to be included on the forms. And because the JDC did not appear on any of LPSS's NSLP/enrollment reports, it was an easy site to miss.

Furthermore, the supporting application documentation clearly shows that LPSS had fully intended *to include* the JDC in its request for discounts on C1 services, and that the request to add the site to Block 4 afterwards was not an afterthought. In this regard, please note the following:

- (1) LPSS *included* the number of incarcerated students attending classes at the JDC in its Block 4-student count on both forms; and
- (2) LPSS *included* in Block 5 on both forms *the cost* of providing the C1 services to the JDC.

It is evident from the foregoing that (1) LPSS fully intended to include the JDC in its requests for discounts, but left the facility off of its Block 4 by mistake; and (2) adding the JDC site now will not require any additional funding, because LPSS included the cost of providing C1 service to the JDC in its applications. Since program rules permit applicants to add sites to its applications in these kinds of circumstances, LPSS's request for review should be granted and USAC's decision reversed.

REQUEST FOR WAIVER

The Commission may waive any provision of its rules on its own motion and for good cause shown.⁴ If USAC's decision somehow turns out to be correct, then a waiver of the Commission's rules is warranted. Adding the JDC's entity number to LPSS's E-Rate applications would enable LPSS to provide E-Rate-supported C1 services to its incarcerated students. Not adding the JDC's entity number to LPSS's E-Rate applications would punish LPSS for committing an insignificant, meaningless mistake.

This case involves some of USAC's most complex, confusing, and oft-changing administrative instructions – namely, how to define, for example, a “NIF”, a “NIF with classrooms,” an “NTE”, a “NIF” that is also an “NTE”, and an “annex,” and when to include entity numbers for those kinds of facilities in Block 4 of a Form 471. Because of this complexity and confusion, it is difficult to know for sure whether the JDC even needed an entity number.

As we have already noted, there is no question that the JDC is an eligible facility. But how LPSS was supposed to classify the JDC for E-Rate purposes is another question entirely, and the answer to that question is anything but clear. The JDC could be a Non-Instructional Facility or “NIF,” but that is probably not a very good fit, since the JDC does not provide any non-instructional services or support. The closest term that fits is “annex.” That is a term that applicants and USAC have been using for years, but which USAC says is “new” (or at least newly defined) for FY2016.⁵ When a school consists of multiple locations separated by public right of ways, USAC is now saying, all of the locations except for the main one will be considered annexes, and annexes, according to USAC 2016, do not need separate entity numbers.

“Annex” may be the answer. Every student in the LPSS has a home school to

⁴ 447 C.F.R. §1.3.

⁵ See Schools and Libraries Program Newsbrief (October 9, 2015) <http://usac.org/sl/tools/news-briefs/preview.aspx?id=644> (Single School With Multiple Locations: If one school has multiple locations (in other words, a school considered to be a single school by the state consists of multiple buildings separated by one or more public rights of way), each location can be identified as an "annex" in the school's profile in the E-Rate Productivity Center (EPC). Annex is a new term for FY2016. Designating locations other than the main location as annexes removes the requirement for applicants to request a separate entity number and confirms that those other locations are not eligible for separate Category Two budgets.)

which he or she is assigned. When one of those students is confined at the JDC, he or she receives educational services there from the LPSS for as long as he or she is there. This makes the JDC, in effect, another location for the school or schools in the district where the JDC students would otherwise be attending class. Since public right of ways separate the JDC from every school in the district, the JDC may very well be an “annex.”

This lack of clarity helps to show just how difficult and unfair the situation is. To prevent any further unwarranted hardship to LPSS as a result of what should have been at best an inconsequential error, it would be appropriate for the Commission to waive its rules if necessary and add this entity to both the FY 2014 and FY2015 applications if it is a requirement.

CONCLUSION

Accordingly, for all of the above reasons, LPSS respectfully requests that the Commission either reverse USAC’s decision or waive its rules, instruct USAC to add BEN No. 17001409 to Block 4 on Form 471 Nos. 971900, 1041461, 1047681, and take any other actions necessary to effectuate this result.

Respectfully submitted

/s/ Lashona Dickerson

Lashona Dickerson
Technology Director
Lafayette Parish School System

March 28, 2015

Exhibit 1



Administrator's Decision On FCC Form 471 Block 4 Update Request

March 7, 2016

LaShona Dickerson
Lafayette Parish School District
113 Chaplin Drive
Lafayette, CA 70502

RECEIVED
MAR 10 2016
Initials

Re: Applicant Name: Lafayette Parish School District
 Billed Entity Number: 139246
 Form 471 Application Number: 1041461
 Funding Request Number(s): 2838592, 2838593, 2838594
 Your Correspondence Dated: December 4, 2015

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your FCC Form 471 Block 4 Entity Addition/Removal and/or FCC Form 471 Block 5/Item 22 Correction Request for your *FY 2015* FCC Form(s) 471. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Identifier Correction Request included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2838592, 2838593, 2838594
Decision: Denied
Explanation:

- Upon thorough review of the appeal letter and the relevant documentation, USAC has determined that on January 4, 2016 the appeals team contacted and requested appellant to provide the missing documentation/information and reminded them on February 12, 2016. In addition, on February 16, 2016 another incomplete response was sent emphasizing that the entity number was invalid and to provide the 2015 entity number. Your response on February 17, 2016 included the same entity name and number as in the original request, therefore your request to update the Entity Lafayette Juvenile Detention (BEN 17001409) was denied since the entity number is not valid for FY 2015.

TO APPEAL THIS DECISION

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - appellant name
 - applicant and service provider names, if different than appellant
 - applicant BEN and service provider SPIN
 - FCC 4711047681 as assigned by USAC
 - Funding Request Number(s) (FRNs) you are appealing if provided in the letter
 - **<insert name of the letter and funding year - both are located at the top of the letter> AND**
 - the exact text or the decision that you are appealing.
3. Please keep your letter to the point and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the "Schools and Libraries" section of the USAC website.

cc: Nick Shipley
2575 Kelley Point Parkway
Funds for Learning
Suite 200
Edmond, OK 73013

Exhibit 2

December 4, 2015

Via email: appeals@sluniversal.service.org

Letter of Appeal

Schools and Libraries Division – Correspondence Unit

30 Lanidex Plaza West

PO Box 685

Parsippany, NJ 07054-0685

LETTER OF APPEAL

Funding Year 2015 – Request to Add Eligible Site to Block 4 of Forms 471

Applicant:	Lafayette Parish School District
Billed Entity Number:	139246
Funding Year:	2015
Form 471 Application Numbers:	1041461; 1047681

The Lafayette Parish School District (“LPSD” or “the District”), by its undersigned representative, hereby appeals the rejection of its request to add an eligible site to the Block 4 of submitted Forms 471 by the Schools and Libraries Division (“SLD”) of the Universal Service Administrative Company.

I. BACKGROUND

On April 11, 2015 and April 16, 2015, LPSD timely filed FCC Forms 471 (Application Numbers: 1041461 and 1047681), seeking Program support for Category One services. After submitting the applications, on July 17, 2015, the District received a Program Integrity Assurance (“PIA”) information request from the SLD. LPSD responded with the necessary information, and the District agreed with certain proposed modifications to reduce the funding request amount.

Upon subsequent review of the applications, it became apparent that the District failed to include a site on the Block 4 of both Forms – the Lafayette Juvenile Detention Center. This omission was simply the result of a clerical or data entry error, as the site is eligible to receive E-rate support and should have been included on the applications. As soon as the mistake was discovered LPSD submitted a request to the PIA reviewer, asking that the site be added to the Block 4 of the Forms 471:

It has come to our attention that during review of Lafayette Parish School District’s applications 1041461 and 1047681 a site was inadvertently left off of the application. The District requests that the following site be added to the Block 4 of the aforementioned FCC Forms 471:

Lafayette Juvenile Detention (BEN 17001409)

Please let us know if any additional information is needed to include this site on the applications.

The PIA reviewer eventually responded to the request, but explained that the only remedy available to the District would have to come via an appeal. LPSD eventually received Funding Commitment Decision Letters approving \$124,167.59 (Application Number: 1041461) and \$508,866.40 (Application Number:

December 4, 2015

1047681) in funding. However, the Lafayette Juvenile Detention site, because it was not included on the Forms 471 as requested, is unable to receive any of the committed E-rate support.

II. DISCUSSION

According to USAC guidance, “adding or removing entities accidentally omitted or included in the FCC Form 471” is generally an allowable correction. The Lafayette Juvenile Detention site, in this case, was accidentally omitted from the District’s Forms 471 – the result of a simple clerical or data entry error. After recognizing its mistake, LPSD attempted to make the “allowable correction” via a request submitted during PIA review. By doing so, LPSD sought to avoid the burden of filing a formal appeal, for both the District and the SLD. However, given the reviewer’s explanation and instruction, LPSD seemed to have no remedy available to correct the error other than through submission of the instant appeal.

But for the District’s mistake, and the SLD’s rejection of its request, the site at issue would be eligible to receive E-rate support. That being the case, LPSD now asks that its request be granted and the site included on the above-mentioned Forms 471. Inclusion of the site on the applications would not alter the discount rate; it would reflect the most accurate Block 4 information; and it would allow the Lafayette Juvenile Detention site to receive funding from the already-committed amount.

III. RELIEF SOUGHT

LPSD respectfully requests that the Lafayette Juvenile Detention site (BEN 139246) be added to Block 4 of its 2015 FCC Forms 471 (Application Numbers: 1041461 and 1047681).

Respectfully,



LaShona Dickerson

Technology Director

Lafayette Parish School District

113 Chaplin Drive

Lafayette, LA 70502

Exhibit A

Request to Add Site to FCC Form 471s

From: Nick Shipley [<mailto:nshipley@fundsforlearning.com>]

Sent: Friday, October 30, 2015 4:17 PM

To: Plewa, Jerzy

Cc: Lori Fadok; JulieAnn Robison

Subject: RE: FY2015 FCC Form 471 Applications 1041461 and 1047681 - LAFAYETTE PARISH SCHOOL DIST

October 30, 2015

Jerzy,

It has come to our attention that during the review of Lafayette Parish School District's applications 1041461 and 1047681 a site was inadvertently left off of the application. The District requests that the following site be added to the Block 4 of the aforementioned FCC Forms 471:

Lafayette Juvenile Detention (BEN 17001409)

Please let us know if any additional information is needed to include this site on the FY2015 applications.

Regards,

NICK SHIPLEY

Compliance Manager

Funds For Learning

nshipley@fundsforlearning.com

From: Plewa, Jerzy [<mailto:Jerzy.PLEWA@sl.universalservice.org>]

Sent: Tuesday, November 03, 2015 6:13 AM

To: Nick Shipley <nshipley@fundsforlearning.com>

Cc: Lori Fadok <lfadok@fundsforlearning.com>; JulieAnn Robison <jrobison@fundsforlearning.com>

Subject: RE: FY2015 FCC Form 471 Applications 1041461 and 1047681 - LAFAYETTE PARISH SCHOOL DIST

Mr. Shipley,

The applications have already been committed with funding commitment decision letters issued. You may file an appeal in order to add the additional site to both applications.

Please let me know if you have any additional questions.

Sincerely,

Jerzy Plewa

Associate Manager, PIA Schools and Libraries

30 Lanidex Plaza West | Parsippany, NJ 07054

T: 973.581.5264 | F: 973.599.6513

jplewa@sl.universalservice.org

Program Integrity Assurance Response

Funding Year 2015

Applicant Name: **Lafayette Parish School District**

Billed Entity Number: **139246**

Form 471 Application Number: **1041461, 1047681**

Date Submitted: **February 5, 2016**

Item 1

During the review of your Funding Year 2015 FCC Form 471 1041461 and 1047681, you indicated that the following entity(ies) is included in your funding request and should be added to the "Discount Calculation" section of your FCC Form 471 application.

Entity Name: The Lafayette Juvenile Detention (BEN 17001409)

Entities may be added to the application only if the applicant can demonstrate that the entities were omitted as a result of a Ministerial or Clerical error.

Question

To assist us in the review of your application, we need the following information on school or library letterhead signed by a chief school or library official (such as the Principal, Vice Principal, Superintendent, Head Librarian, etc.):

1. Were the entities listed above omitted from your FCC Form 471 application due to a Ministerial and Clerical (M&C) error? ____ Yes ____ No
 - If No, no additional information is needed.
 - If Yes, please provide a copy of the source documentation used to prepare your FCC Form 471 application which shows that the entity(ties) to be added are actually receiving service and the dollars associated (if applicable). Examples of supporting documentation are contracts, vendor quotes, vendor bills, invoices, etc.

In addition to the source documentation, your response must include:

1. The Entity Name and associated Entity Number.
Note: If you do not have an entity number, please call the Client Service Bureau at 888-203-8100.
2. Discount information (e.g. total student enrollment and number of students eligible for participation in the National School Lunch Program or NSLP).
3. The Rural/Urban status of the entity.
4. A list of all the FRNs that will be providing services to these entities.
5. State whether the dollars associated with the entity(ies) have already been included in the FRNs or provide the dollars associated with the entity(ies) per FRN.

Item 1 Response

Yes, Lafayette Juvenile Detention (BEN 17001409) should be added to the "discount calculation" section of FCC Forms 471 1041461 and 1047681. Vendor invoice demonstrating existence of the site is included below.

1. Lafayette Juvenile Detention (BEN 17001409)
2. The student population is constantly in flux due to the nature of the site.

A copy of the signed snapshot is included below for your convenience.

3. Rural
4. FRNs 2838592, 2838593, 2859574, 2838594, and 2859573.
5. Yes, dollars associated with the entity have already been included in the FRNs.



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www.hunttelecom.com
support@telco.bz

10/1/2015

Invoice # **60587**

Description: LPSD-2015-1015-WANADD

Sold To :

Lafayette Parish School District
Central Office
113 Chaplin Drive
Lafayette, LA 70508

Bill To :

Lafayette Parish School District
Accounts Payable
113 Chaplin Drive
Lafayette, LA 70508

Qty.	Product / Service Description	Unit Cost	Extended Cost
2	WAN Services - 1 GIG Circuits at 1G Speed October 2015	\$ 888.00	\$ 1,776.00

Juvenile Detention Center
Vermillion Conference #35

WAN locations are not covered under ERATE
FRN 2859573. LPSD must pay 100% of this invoice.

Total	\$ 1,776.00
Discount Level (per SLC filing) 0 percent	\$ -
Total Due and Payable	\$ 1,776.00



LAFAYETTE
PARISH SCHOOL SYSTEM

LaShona Dickerson
Technology Director
P.O. Drawer 2158
Lafayette, LA 70502
337.521.7521
ladickerson@lpssonline.com

January 5, 2016

To Whom it May Concern,

The Lafayette Juvenile Detention (BEN 17001409) was inadvertently left off of FCC Forms 1041461 and 1047681. This omission is due solely to ministerial and clerical error. Please find below site information:

APPLICANT NAME The Lafayette Detention Center	BILLED ENTITY NUMBER 17001409
Total Student Enrollment At Time of Filing 28	Students Eligible for F/R Lunch At Time of Filing 28
Urban/Rural Status Rural	FRNs providing service to this site 2838592, 2838593, 2859574, 2838594, and 2859573
Have dollars associated with this entity already been included in the FRNs? Yes	

Signed:

LaShona Dickerson
Technology Director

E-rate Appeal Information Request Response

Funding Year 2015

Applicant Name: **Lafayette Parish School District**

Billed Entity Number: **139246**

Form 471 Application Number: **1041461 and 1047681**

Date Submitted: **February 17, 2016**

Item 1

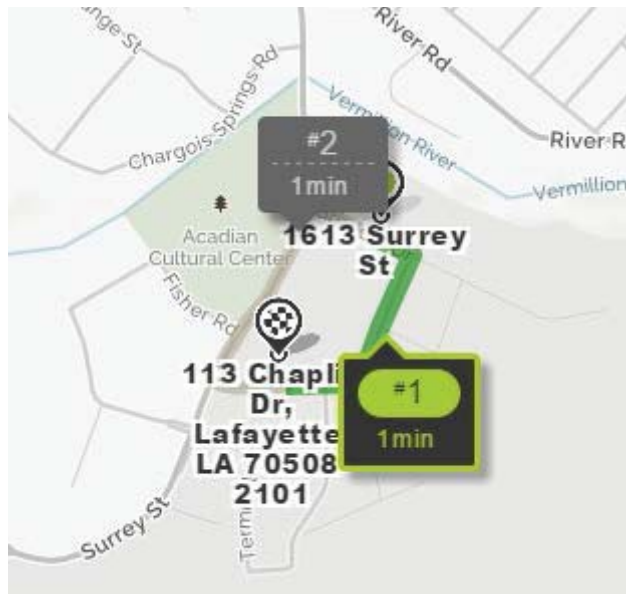
The response is still incomplete as the entity number is invalid for FY 2015. Please provide the 2015 entity number. The due date remains 2/17/2016.

Item 1 Response

The service provider invoice previously provided is the source documentation used to prepare the funding request. The invoice is attached again for reference. Because the District does not serve meals at this location it is not on the report for NSLP and enrollment which added to the oversight and missed listing of this site on the block 4 of the FCC Form 471.

The District received conflicting information from the CSB as to whether or not a separate entity number was, and even is, required for the Juvenile Center. As you can see from the map quest view the center is located beside the district central office (1 minute). The students attending the center are enrolled at other Lafayette school locations and capturing the enrollment and NSLP eligibility is done as a snapshot for that location (attached again for your reference). The students are temporarily located in the juvenile center and the district is responsible for providing services to those students.

Since these students are enrolled at other Lafayette locations the placement at the juvenile center may be considered by USAC as an annex or a co-location facility, but this year USAC advised obtaining an entity number and adding this facility to the application to allow for reimbursement for services paid directly to the location.





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www.hunttelecom.com
support@telco.bz

10/1/2015

Invoice #

60587

Description: LPSD-2015-1015-WANADD

Sold To :

Lafayette Parish School District
Central Office
113 Chaplin Drive
Lafayette, LA 70508

Bill To :

Lafayette Parish School District
Accounts Payable
113 Chaplin Drive
Lafayette, LA 70508

Qty.	Product / Service Description	Unit Cost	Extended Cost
2	WAN Services - 1 GIG Circuits at 1G Speed October 2015	\$ 888.00	\$ 1,776.00

Juvenile Detention Center
Vermillion Conference #35

WAN locations are not covered under ERATE
FRN 2859573. LPSD must pay 100% of this invoice.

Total	\$ 1,776.00
Discount Level (per SLC filing) 0 percent	\$ -
Total Due and Payable	\$ 1,776.00



LAFAYETTE
PARISH SCHOOL SYSTEM

LaShona Dickerson
Technology Director
P.O. Drawer 2158
Lafayette, LA 70502
337.521.7521
ladickerson@lpssonline.com

January 5, 2016

To Whom it May Concern,

The Lafayette Juvenile Detention (BEN 17001409) was inadvertently left off of FCC Forms 1041461 and 1047681. This omission is due solely to ministerial and clerical error. Please find below site information:

APPLICANT NAME The Lafayette Detention Center	BILLED ENTITY NUMBER 17001409
Total Student Enrollment At Time of Filing 28	Students Eligible for F/R Lunch At Time of Filing 28
Urban/Rural Status Rural	FRNs providing service to this site 2838592, 2838593, 2859574, 2838594, and 2859573
Have dollars associated with this entity already been included in the FRNs? Yes	

Signed:

LaShona Dickerson
Technology Director